

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RICK HARRISON et al.,

Plaintiffs,

-against-

REPUBLIC OF SUDAN,

Defendant.

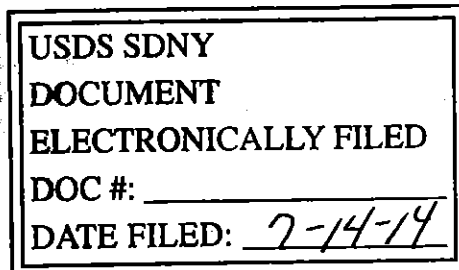
RICK HARRISON et al.,

Petitioners,

-against-

AMERICAN EXPRESS TRAVEL RELATED
SERVICES, CO., et al.

Respondents/Garnishees.



Case No. 1:13-cv-03127 (PKC)

**NOTICE OF MOTION FOR
LEAVE TO FILE EXHIBIT
UNDER SEAL**

*Application
Granted.
SO ORDERED
JDS
7-14-14*

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Sean C. McPhee, Esq. dated June 30, 2014; the accompanying memorandum of law dated June 30, 2014; and upon all papers and proceedings previously had herein, and in accordance with the Court's Addendum to Protective Agreement and Order (Docket No. 123 at p. 23), Respondent/Garnishee, HSBC Bank USA, N.A. ("HSBC"), will move this Court, Hon. P. Kevin Castel, United States District Judge, on submission only and without oral argument for (1) an Order granting HSBC leave to file Exhibit A to its forthcoming Third-Party Petition Alleging Counterclaims and Claims in the Nature of Interpleader under seal; and (2) granting such other and further relief as the Court deems just and proper.

Dated: Buffalo, New York
June 30, 2014

PHILLIPS LYTLE LLP

By: /s/ Sean C. McPhee
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